

STINSON LLP

1144 Fifteenth St., Suite 2400
Denver, CO 80202
Tel: 303.376.8400
Zane A. Gilmer, Atty. Reg. No. 7-4545
Zane.Gilmer@stinson.com

Patrick A Edwards (Admitted Pro Hac Vice)
1625 N. Waterfront Parkway, Suite 300
Wichita, KS 67206
Tel: 316.265.8800
Patrick.Edwards@stinson.com

David R. Barnard (Admitted Pro Hac Vice)
1201 Walnut Street, Suite 2900
Kansas City, MO 64106
Tel: 816.842.8600
David.Barnard@stinson.com

Adrianna M. Chavez (Admitted Pro Hac Vice)
1850 N. Central Avenue, Suite 2100
Phoenix, AZ 85004
Tel: 602.279.1600
Adrianna.Chavez@stinson.com

*Attorneys for Plaintiff/Counterclaim-Defendant
Jorns & Associates, LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

JORNS & ASSOCIATES LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:23-cv-247-KHR
)	
WCMS MEDIA LLC and JESS E. ROGERS, SR.,)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff Jorns & Associates LLC and Defendants WCMS Media LLC and Jess E. Rogers, Sr. (jointly “the Parties”) hereby move the Court for entry of a stipulated protective order

governing the confidentiality of discovery and production of documents in this case. The Protective Order is necessary because the parties will be producing documents that contain proprietary confidential and trade secret information. The Protective Order is also necessary as privacy laws attach to Jorns' customer information, which also will be produced in this case. Because these materials are critical to Jorns' reputation and competitive position in the tax industry, or otherwise contain confidential and sensitive personal identifying information, an order limiting their use and dissemination is appropriate. The parties have agreed to the form and content of a Stipulated Protective Order, attached hereto as Exhibit A.

WHEREFORE, the Parties jointly, respectfully request the Court to enter the attached Stipulated Protective Order.

Dated: August 26, 2024.

Respectfully submitted,

By: /s/ Zane A. Gilmer

Zane A. Gilmer (Wyoming Bar #7-4545)

STINSON LLP

1144 Fifteenth Street, Suite 2400

Denver, Colorado 80202

Phone: 303-376-8416

Fax: 303-578-7966

zane.gilmer@stinson.com

*Attorneys for Plaintiff and Counterclaim-
Defendant*

By: /s/ Steven Fried

Paula Fleck (Wyoming Bar #6-2660)

Erik J. Adams (Wyoming Bar #8-6953)

HOLLAND & HART LLP

645 S. Cache Street, Suite 100

P.O. Box 68

Jackson, WY 83001

Telephone: (307) 739-9741

Facsimile: (307) 739-9744

pfleck@hollandhart.com

ejadams@hollandhart.com

Steven Fried (Admitted Pro Hac Vice)

954 Lexington Avenue #1051

New York, NY 10021

(917) 280-2468

sfried@olyverapp.com

*Attorneys for Defendants and Counterclaim
Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

Paula Fleck
Erik J. Adams
HOLLAND & HART LLP
645 S. Cache Street, Suite 100
P.O. Box 68
Jackson, WY 83001
Telephone: (307) 739-9741
Facsimile: (307) 739-9744
pfleck@hollandhart.com
ejadams@hollandhart.com

Steven Fried (PHV)
954 Lexington Avenue #1051
New York, NY 10021
(917) 280-2468
sfried@olyverapp.com

ATTORNEYS FOR DEFENDANTS
AND COUNTERCLAIMANTS

By: /s/ Zane A. Gilmer
Zane A. Gilmer